

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

John A. D'Andrea, Jr.

Debtor(s)

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Case No.: 20-10865-elf

Chapter 13

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY SN SERVICING CORPORATION AS SERVICER FOR U.S.
BANK TRUST NATIONAL ASSOCIATION, ET AL**

COMES NOW, Debtor, John A. D'Andrea, Jr., hereinafter referred to as "Debtor," by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by SN Servicing Corporation as servicer for U.S. Bank Trust National Association, et al., "Movant", and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted in part, Denied in part
6. Denied. By way of further response, it is specifically requested that the undersigned Counsel be provided with a complete post-petition payment history.
7. Denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: October 20, 2020

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.

Attorney for the Debtor

Sadek & Cooper

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